Dmitry Lapin, Esq. (NY, NJ, PA, and ME) 535 N. Church Street #304 West Chester, PA 19380 (917)-979-4570 dmitry@axenfeldlaw.com



VIA ECF

October 16, 2024

Hon. Lorna G. Schofield Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007 Application **GRANTED**. Plaintiff shall file any motion for default judgment against the Turkish Defendants by **November 15, 2024**.

Dated: October 17, 2024 New York, New York

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: XYZ Corp., v. Individuals, et. al., (Dkt # 1:24-cv-01962-LGS)

Request for Adjournment of Plaintiff's Deadline to File its Motion for Default Judgement against the remaining Turkish Defendants.

Dear Hon. Schofield:

This office represents Plaintiff in the above referenced copyright infringement action. The Court previously granted Plaintiff's request to extend the deadline to file its motion for Default Judgement against Defendants residing in Turkey until October 18, 2024. [ECF No. 75 and 78].

Plaintiff respectfully request a four-week extension of the current deadline, until November 15, 2024, due to my own, unforeseen personal circumstances. My son was born prematurely several months ago, and just last week, he was discharged from the hospital—two weeks earlier than the expected discharge date. Since his birth, I have been working on a limited basis while attending to him and my wife in the hospital. I expect to return to work full-time within the next three weeks. Given these circumstances, a four-week extension is necessary to allow sufficient time to prepare and file Plaintiff's motion for default judgment against the Turkish Defendants.

Thank you for your attention to this matter.

Respectfully submitted,

Dmitry Lapin, Esq.